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*Attorneys for Defendant*  
 JONATHAN FLORES

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 19-584 RS
	)	
Plaintiff,	)	STIPULATION AND ORDER TO CONTINUE
	)	COURT DATE FROM MARCH 29, 2022 TO
v.	)	APRIL 5, 2022 AND EXCLUDE TIME UNDER
	)	THE SPEEDY TRIAL ACT
JONATHAN FLORES,	)	
	)	
Defendant.	)	

The parties are scheduled for a change of plea hearing pursuant to a diversion agreement on March 29, 2022. The defense has become unavailable on March 29, 2022, and in any event, the parties require additional time to formalize their agreement. Thus, the defense requests that the matter be continued to April 5, 2022 at 9:30 a.m. The government has no objection to this request.

Thus, the parties stipulate and agree it would be appropriate to exclude the time from March 29, 2022 through April 5, 2022 under the Speedy Trial Act to allow for effective preparation of and continuity of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C.

§§ 3161(h)(7)(A), (B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from March 29, 2022 through April 5, 2022 from computation under the Speedy

1 Trial Act outweigh the best interests of the public and defendant in the prompt resolution of this case.

2 *See id.*

3 The undersigned defense attorney certifies that she has obtained approval from counsel for the  
4 United States to file this stipulation and proposed order.

5 IT IS SO STIPULATED.

6 DATED: March 28, 2022

/s/ Shawn Halbert

SHAWN HALBERT

DARLENE COMSTEDT

Attorneys for Defendant Jonathan Flores

10 DATED: March 28, 2022

STEPHANIE M. HINDS

United States Attorney

/s/ with permission

CHRISTINA LIU

DAN KARMEL

Assistant United States Attorneys

**ORDER**

Based upon the representations of counsel and for good cause shown, the Court finds that this matter should be continued from March 29, 2022 to April 5, 2022 at 9:30 a.m.

The Court further finds that that failing to exclude the time from March 29, 2022 through April 5, 2022 would unreasonably deny defense counsel and defendant the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv). The Court further finds that the ends of justice served by excluding the time from March 29, 2022 through April 5, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and defendant in a speedy trial. *See* § 3161(h)(7)(A).

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that this matter shall be continued from March 29, 2022 to April 5, 2022 at 9:30 a.m., and that the time from March 29, 2022 through April 5, 2022 shall be excluded from computation under the Speedy Trial Act. *See id.*

**IT IS SO ORDERED** this 28th day of March 2022.



THE HONORABLE RICHARD SEEBORG  
United States District Judge